

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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YIEN-KOO KING, NORTHWICH :
INVESTMENTS LTD., and SOON HUAT, :
INC. :

Plaintiffs, :

-against- :

ANDREW WANG, SHOU-KUNG WANG, :
BAO WU TANG, JIAN BAO GALLERY, :
ANTHONY CHOU, CHEN-MEI-LIN, WEI :
ZHENG, YE YONG-QING, YUE DA-JIN :
and JOHN DOES 1-9, :

Defendants. :

Civ. Action No.: 1:14-cv-07694 (LJL)

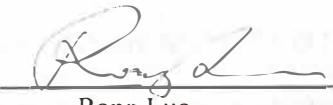
**DECLARATION OF RONG LUO IN
SUPPORT OF DEFENDANTS ANDREW
WANG AND SK WANG'S MOTION FOR
SUMMARY JUDGMENT**

I, RONG LUO, do hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746,
the following to be true and correct:

1. I am the wife of Andrew Wang and the daughter-in-law of Shou-Kung Wang.
2. I respectfully submit this declaration, which is based upon my personal knowledge, in support of Andrew Wang and Shou-Kung Wang's motion for summary judgment.
3. I understand that Plaintiff in the above-captioned action has raised a question as to the identity of Zhu Mengxia and the transfer of funds from Zhu Mengxia to the Shou-Kung Wang Irrevocable Trust (the "Trust").
4. Zhu Mengxia is my mother.
5. Zhu Mengxia lives in China.
6. The funds Zhu Mengxia transferred to the Trust on September 27, 2013 were a gift for her grandson, Andrew's and my son, who is the Trust's beneficiary.

7. It is, and at all times was, my understanding that the property of the Trust is not the property of Shou-Kung Wang personally and that he has no control over the assets of the Trust.

Dated: New York, New York
May 4, 2020


Rong Luo